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10 *LexisNexis Risk Solutions Inc.*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DALE C. BURNS,
v.
EARLY WARNING SERVICES, LLC
LEXISNEXIS RISK SOLUTIONS INC.,
Defendants.

Case No. 2:19-cv-02142-RFB-DJA
**STIPULATION AND ORDER TO EXTEND
TIME TO ANSWER OR OTHERWISE
PLEAD**
(FIRST REQUEST)

Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada, Defendant LexisNexis Risk Solutions Inc. (“Defendant”) and Plaintiff Dale C. Burns (“Plaintiff”) (collectively “the Parties”), by and through their respective counsel, stipulate as follows:

1. Plaintiff filed the First Amended Complaint for Damages on December 18, 2019.
2. Defendant was served with the First Amended Complaint for Damages on December 19, 2019.
3. Defendant’s deadline to answer or otherwise respond to Plaintiff’s First Amended Complaint was January 9, 2020.
4. The undersigned counsel for Defendant was recently retained, and is in the process of obtaining proper documents in order to address specific allegations made in Plaintiff’s First Amended Complaint.

1 5. The Parties agreed to an extension for Defendant to answer or otherwise respond
2 to Plaintiff's First Amended Complaint on January 8, 2020, allowing Defendant to formulate a
3 response up to and including February 10, 2020.

4 6. This is the first request by Defendant seeking such extension.

5 In consideration of the foregoing, and for good cause, it is hereby STIPULATED AND
6 AGREED by and between the Parties, that Defendant LexisNexis Risk Solutions Inc. shall have up
7 to and including February 10, 2020 to file an answer or otherwise respond to Plaintiff's First
8 Amended Complaint.

9 **IT IS SO STIPULATED**

10 Dated this 30th day of January, 2020.

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12 _____
13 /s/ *Miles N. Clark, Esq.* _____
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13 /s/ *Gary E. Schnitzer, Esq.* _____
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Attorney for Defendant
Lexis Nexis Risk Solutions Inc.

24 **IT IS SO ORDERED.**

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28 United States Magistrate Judge

27 Dated this 3rd day of February, 2020.